

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 04-CR-10076-RGS
v.)	VIOLATIONS:
)	
1. CASSANDRA BEATTY)	21 U.S.C. § 963
2. TERRENCE DAVIS)	Conspiracy to Import Cocaine
)	
)	21 U.S.C. §§ 952(a) & 960(a)
)	Importation of Cocaine
)	
)	21 U.S.C. § 853
)	Forfeiture Allegation

SUPERSEDING INDICTMENT

COUNT ONE: (21 U.S.C. § 963 - Conspiracy to Import Cocaine)

The Grand Jury charges that:

In or about December 2003, at Boston, in the District of
Massachusetts, in Jamaica, and elsewhere,

1. CASSANDRA BEATTY, and

2. TERRENCE DAVIS

defendants herein, did knowingly and intentionally combine,
conspire, confederate and agree with each other, and with persons
known and unknown to the Grand Jury, to import into the United
States, from a place outside thereof, cocaine, a Schedule II
controlled substance, in violation of Title 21, United States
Code, Sections 952(a) and 960(a).

The Grand Jury further charges that the conspiracy involved
500 grams or more of a mixture and substance containing a
detectable amount of cocaine, in violation of Title 21, United
States Code, Section 841(b)(1)(B)(i).

All in violation of Title 21, United States Code, Section
963.

COUNT TWO: (21 U.S.C. § 952(a) & 960(a) - Unlawful
Importation of Cocaine)

The Grand Jury further charges that:

On or about December 2, 2003, in Boston, in the District of
Massachusetts, and elsewhere,

CASSANDRA BEATTY,

defendant herein, did knowingly and intentionally import into the
United States, from a place outside thereof, cocaine, a Schedule
II controlled substance.

All in violation of Title 21, United States Code, Sections
952(a) and 960(a).

COUNT THREE: **(21 U.S.C. §§ 952(a) & 960(a) - Unlawful
Importation of Cocaine)**

The Grand Jury further charges that:

On or about December 2, 2003, in Boston, in the District of Massachusetts, and elsewhere,

TERRENCE DAVIS,

defendant herein, did knowingly and intentionally import into the United States, from a place outside thereof, cocaine, a Schedule II controlled substance.

The Grand Jury further charges that the importation involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i).

All in violation of Title 21, United States Code, Sections 952(a) and 960(a).

FORFEITURE ALLEGATION

(21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the narcotics offenses alleged in Counts One, Two, and Three of this Indictment,

CASSANDRA BEATTY and

TERRENCE DAVIS

defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the property described in paragraphs 1 and 2.

All in violation of Title 21, United States Code, Section 853.

NOTICE OF ADDITIONAL FACTORS

The Grand Jury further charges that:

1. Defendant Cassandra Beatty is responsible for at least 500 grams but less than two kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance. Accordingly, U.S.S.G. § 2D1.1(c)(7) is applicable to this defendant.

2. Defendant Terrence Davis is responsible for at least 500 grams but less than two kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance. Accordingly, U.S.S.G. § 2D1.1(c)(7) is applicable to this defendant.

A TRUE BILL

William J. Kelly
FOREPERSON OF THE GRAND JURY

David G. Tobin

DAVID G. TOBIN
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; October 28, 2004.

Returned into the District Court by the Grand Jurors and
filed.

William J. Kelly
DEPUTY CLERK

10/28/04

(u13) 2:05pm

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Logan Airport Category No. II Investigating Agency ICE

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Yes Case No. 04-CR-10076-RGS
Same Defendant Yes New Defendant _____
Magistrate Judge Case Number 03-906-MBB
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Cassandra Ann Beatty Juvenile ☐ Yes ☒ No

Alias Name _____

Address 591 Kelton Avenue, Columbus, OH 43205

Birth date (Year only): 1969 SSN (last 4 #): 0339 Sex F Race: Black Nationality: USA

Defense Counsel if known: Martin Richey Address: Federal Defender's Office
Boston, MA 02210

Bar Number: _____

U.S. Attorney Information:

AUSA David G. Tobin Bar Number if applicable 552558

Interpreter: ☐ Yes ☒ No List language and/or dialect: _____

Matter to be SEALED: ☐ Yes ☒ No

☐ Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date: 12/2/3003

☒ Already in Federal Custody as 12/3/2003 in U.S. Marshal Service

☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by _____ on _____

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: October 28, 2004

Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Cassandra Ann Beatty

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 USC § 963</u>	<u>Conspiracy to Import Cocaine</u>	<u>1</u>
Set 2	<u>21 USC §§ 952(a), 960(a)</u>	<u>Unlawful Importation of Cocaine</u>	<u>2</u>
Set 3	<u>21 USC § 853</u>	<u>Criminal forfeiture Allegation</u>	
Set 4			
Set 5			
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

ADDITIONAL INFORMATION:

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Logan Airport Category No. II Investigating Agency ICE

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Yes Case No. 04-CR-10076-RGS
Same Defendant Yes New Defendant _____
Magistrate Judge Case Number 03-906-MBB
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Terrence Lamar Davis Juvenile ☐ Yes ☒ No

Alias Name _____

Address 169 Punta Ally, Columbus, OH 43201-3541

Birth date (Year only): 1969 SSN (last 4 #): 5494 Sex M Race: Black Nationality: USA

Defense Counsel if known: Michael J. Liston Address: 2 Park Plaza, Suite 610
Boston, Ma 02116

Bar Number: _____

U.S. Attorney Information:

AUSA David G. Tobin Bar Number if applicable 552558

Interpreter: ☐ Yes ☒ No List language and/or dialect: _____

Matter to be SEALED: ☐ Yes ☒ No

☐ Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date: 12/2/03

☒ Already in Federal Custody as 12/3/03 in U.S. Marshal Service

☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by _____ on _____

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: October 28, 2004

Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Terrence Davis

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 U.S.C. § 963</u>	<u>Conspiracy to Import Cocaine</u>	<u>1</u>
Set 2	<u>21 USC §§ 952(a), 960(a)</u>	<u>Unlawful Importation of Cocaine</u>	<u>3</u>
Set 3	<u>21 USC § 853</u>	<u>Criminal Forfeiture allegation</u>	
Set 4			
Set 5			
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

ADDITIONAL INFORMATION: